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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 Juh’Juan Washington,
13 Petitioner,
14 v.
15 Calvin Johnson, *et al.*,
16 Respondents.

Case No. 2:23-cv-02002-RFB-NJK

**Unopposed Motion for an
Extension of Time to File Amended
Petition
(First Request)**

1 **POINTS AND AUTHORITIES**

2 Petitioner Juh’Juan Washington respectfully moves for an extension of 61
3 days to file his amended petition under 28 U.S.C. § 2254, up to and including April
4 7, 2025. The amended petition is currently due on February 5, 2025. Respondents,
5 by Deputy Attorney General Christine Greve, do not object to this request for an
6 extension. Respondents’ lack of objection to this request should not be construed as
7 a waiver of any procedural defense or argument. This is Petitioner’s first request for
8 an extension.

9 Juh’Juan filed his pro se federal habeas petition and motion for appointment
10 of counsel on December 4, 2023.¹ He filed his application to proceed in forma pauperis
11 on May 16, 2024.² On September 30, 2024, this Court granted his application to
12 proceed in forma pauperis and appointed the Federal Public Defender to represent
13 him.³ Undersigned counsel appeared for Juh’Juan on October 29, 2024.⁴

14 Undersigned counsel respectfully submits that additional time is necessary to
15 properly prepare the amended petition because counsel has not been able to obtain
16 the discovery in this case. Prior counsel Thomas Boley and Kelsey Bernstein have been
17 unable to provide the discovery file to undersigned counsel. Counsel has requested
18 discovery from the Las Vegas Metropolitan Police Department. Counsel submits that
19 discovery is necessary for the preparation of the amended petition.

20 This motion is not filed for the purposes of delay, but in the interests of justice
21 and the interests of Petitioner. Undersigned counsel respectfully asks this Court to
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24 ¹ ECF Nos. 2-1 and 3.

25 ² ECF No. 7.

26 ³ ECF No. 10.

27 ⁴ ECF No. 15.

1 grant Petitioner's request to extend the time for filing his amended petition by 61
2 days until April 7, 2025.

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4 Respectfully submitted,

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6 Rene L. Valladares
7 Federal Public Defender

8 /s/ Ron Y. Sung

9 Ron Y. Sung
10 Assistant Federal Public Defender.

11
12 Dated February 6, 2025.

13 IT IS SO ORDERED:

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16 United States District Judge
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